



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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June 17, 2024

Via ECF

Honorable Edgardo Ramos
United States District Court for the
Southern District of New York
40 Foley Square, Courtroom 619
New York, NY 10007

**Re: Nunzio Calce et al., v. The City of New York
Civil Action No. 1:21-8208 (ER)**

Dear Judge Ramos:

This Office represents Defendant, the City of New York, in the above-entitled action and submits this letter-motion pursuant to Rule 1E of Your Honor's Individual Practices in Civil Cases to request a 3-week extension of time, from June 21, 2024 to July 12, 2024, for Defendant to file its final reply in support of its cross-motion for summary judgment and in opposition to Plaintiffs' motion for summary judgment. Defendant further requests permission to file five (5) excess pages so that its reply brief may be up to fifteen (15) pages in length. Plaintiffs' counsel consents to both of these requests.

Good cause exists for the requested extension of time because counsel for Defendant will be out of town for periods of time over the next several weeks and requires additional time to fully research the facts and legal arguments set forth in Plaintiffs' opposition papers. No other dates will be affected by this request.

Thank you for your time and consideration of this request.

Respectfully submitted,

/s/ Samantha Schonfeld

cc: All Counsel of Record (via ECF)